

REMARKS/ARGUMENTS

The Office Action dated October 24, 2006 has been received and carefully studied.

Claims 12-19 have been cancelled without prejudice.

The Examiner rejects claim 2 under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as his invention. Specifically, the Examiner states that the phrase "the path between said server and said network" lacks proper antecedent basis. By the accompanying amendment, claim 2 has been modified to overcome this rejection.

The Examiner rejects claims 1-8, and 20-25 under 35 U.S.C. §102(e) as being anticipated by Ikonen (U.S. Patent No. 7,003,575). With respect to claims 1,3,24, and 25, the Examiner states that Ikonen teaches a method and a respective computer program for operating a computer network server in a computer network comprising maintaining a connection with a central node, receiving a command from said central node to open a listening port after central node receives a request from a client to access said server, opening a listening port, sending to the central node instructions for the client to connect to the server over the listening port and receiving communication from the client after the central node delivers a command to the client to connect to the server.

This rejection is respectfully traversed. First, with respect to claims 1 and 24, those claims require that the server access the central node, obtain network addresses for the intended clients, and establish a connection to those clients. The Examiner does not recite these steps in

the Office Action, rather only the steps associated with claims 3 and 25 are discussed. Furthermore, this method of communication between the server and the client is not discussed in the Ikonen reference. Specifically, Ikonen does not disclose that the server establishes a connection to specific clients. Rather, Ikonen discloses that the client always initiates communication with the server. Thus, claims 1 and 24, and all claims dependent on those claims are believed to be in condition for allowance.

With respect to claim 3, the Examiner states that Ikonen discusses all of the recited steps and cites specific passages in columns 8 and 9 for support. This rejection is respectfully traversed. Although not explicitly stated by the Examiner, it appears that the Examiner believes that the redirection database corresponds to the central node of the present claim. Assuming this configuration, Ikonen does not anticipate the present claim. The present claim 3 requires that the central node "receives a request from said at least one client to access said server". This communication is not disclosed by Ikonen. In fact, the client ALWAYS directly contacts a server, which then communicates to the redirection database. The client never communicates directly with the redirection database (i.e. central node). Thus, the second step of the method recited in claim 3 is not anticipated.

The present claim 3 also requires that the "central node delivers a command to said at least one client". As stated above, the redirection database never communicates with the client in the Ikonen disclosure. Thus, the fifth step of the method recited in claim 3 is also not anticipated.

Furthermore, Ikonen discloses a method for solving a completely different problem than the present invention. Ikonen is concerned with sharing the load between a number of accessible servers. It accomplishes this by having a redirection database which determines whether a client, after making initial contact with a server, should be allowed to continue communicating with that server, or whether another server is a more appropriate target of the client's communications. In fact, claim 1 of Ikonen recites that method of communication begins with a packet sent from the client to a first server. In stark contrast, the present invention attempts to minimize access to the server, unless properly authorized by a central node. Thus, while the client initiates contact with the server in Ikonen as the first step of the process, such a client-server contact is the final step of the communication process in the present invention. All communications before that point are between the central node and the server or the central node and the client. Thus, claim 3 and all claims dependent on that claim are not anticipated by Ikonen and are believed to be in condition for allowance.

The Examiner also rejects claim 25 for this same reasons listed above. Since claim 25 recites a computer program having the means to implement the steps recited in claim 3, it is not anticipated by Ikonen for the reasons stated above.

The Examiner rejects claim 2, noting the Ikonen discloses a Network Translation device. Claim 2 is dependent on claim 1. As stated above, the Examiner never presented a prima facie case that claim 1 was anticipated. Thus, claim 2 by virtue of its dependence on claim 1 is believed to be allowable.

The Examiner rejects claim 4, stating that Ikonen discloses a predetermined listening time of less than one second. This rejection is respectfully traversed. Ikonen never discusses or discloses any information concerning the accessibility of the listening port, and clearly never discloses this time as being less than one second. Furthermore, this claim is allowable due to its dependence on claim 3, as described above.

The Examiner rejects claim 5, stating that Ikonen discloses closing the listening port after receipt of a communication, noting that closing the port is inherent. This rejection is respectfully traversed. There is no disclosure that the server closes the listening port after receipt of the message. In fact, it is obvious that the listening port remains accessible since other clients can and are allowed to access the server. Furthermore, this claim is allowable due to its dependence on claim 3, as described above.

The Examiner rejects claim 6, stating that Ikonen discloses establishing a network connection after receipt of a communication. This claim is allowable due to its dependence on claim 3, as described above.

The Examiner rejects claim 7, stating that Ikonen discloses that the server closes its listening port if it receives communication from other than the authorized client, citing column 10, lines 1-30. Ikonen, neither in the cited passage nor anywhere in the specification, discloses that the server will close its listening port if accessed by an unauthorized client. In fact, as mentioned above, the server is generally available for communication from all clients, and thus such an action would not be beneficial for a load sharing application. Furthermore,

this claim is allowable due to its dependence on claim 3, as described above.

The Examiner rejects claim 8, stating that Ikonen discloses a persistent connection with the central node. This claim is allowable due to its dependence on claim 3, as described above.

The Examiner rejects claim 20, stating that Ikonen discloses a computer system, comprising a central node, a server and at least one authorized client, wherein said server is adapted to receive notification from said central node that said authorized client wishes to communicate with said server and in response to said notification, is adapted to open a listening port for said authorized client to connect to and sends instructions to said central node to notify said authorized client to communicate to said listening port. The Examiner cites the passages listed above for support. It is unclear from the Office Action how the Examiner interprets Ikonen to make this rejection. Ikonen describes two methods for load sharing, shown in Figures 7 and 8. If the Examiner is applying the method described in Figure 7, the rejection is improper. Claim 20 requires that the server opens a listening port after being notified by the central node and then sends instructions to the central node to notify the client. In Figure 7, it is clear that the client communicates directly with the server before the central node ever notifies the server of the client's intention. Furthermore, the server never sends instructions to the central node to notify the client to communicate on the listening port (since communication is already occurring). If the Examiner is applying the method shown in Figure 8, and treating server 1 as the "server" as recited in the present claim, the rejection is improper.

Server 1 communicates with the client before any notification by the server. In fact, the notification that is received informs the server 1 to terminate, not initiate, communications with the client. Again, the server never sends instructions to the central node to notify the client to communicate on the listening port. Lastly, if the Examiner is applying the method shown in Figure 8, and treating server 2 as the "server" as recited in the present claim, the rejection is still improper. In figure 8, server 2 is never notified by the central node of the client's desire to communicate. Rather, the only communication to which server 2 is a participant is between the client and server 2. Server 2 has no interaction at all with the central node. Thus, claim 20 and all claims dependent on claim 20 are believed to be in condition for allowance.

The Examiner rejects claim 21, stating that the server is adapted to close the listening port if an unauthorized client attempts to communicate. As explained above, this is not disclosed in Ikonen, and would not be beneficial to a load sharing application where multiple clients are in communication with multiple servers. Furthermore, this claim is allowable due to its dependence on claim 20, as described above.

The Examiner rejects claim 22, stating that Ikonen discloses establishing a network connection after receipt of a communication. This claim is allowable due to its dependence on claim 20, as described above.

The Examiner rejects claim 23, stating that Ikonen discloses closing the listening port after receipt of a communication, noting that closing the port is inherent. This rejection is respectfully traversed. There is no disclosure that the server closes the listening port after

receipt of the message. In fact, it is obvious that the listening port remains accessible since other clients can and are allowed to access the server. Furthermore, this claim is allowable due to its dependence on claim 20, as described above.

The Examiner rejects claims 9-11 as being unpatentable under 35 U.S.C. §113(a) over Ikonen. The Examiner takes official notice that encrypting communication packets is old and well known in the art for establishing secure communications. However, these claims are allowable due to their dependence on claim 3, which is believed to be in condition for allowance, based on the earlier arguments.

Reconsideration and allowance are requested in view of the foregoing arguments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Frame', is written over the typed name.

Robert Frame

Reg. No. 54,104

176 E. Main Street-Suite 7

Westboro, Massachusetts 01581

TEL: (508) 898-1818